

Exhibit A
Competing Plan Confirmation Timeline

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Proposed Competing Plan Confirmation Timeline

- December 11, 2019:** Oral argument on inverse condemnation issue.
- December 16, 2019:** Oral argument on postpetition interest rate issue.
- January 6, 2020:** Oral argument on make-whole premium issue.
- January 7, 2020:** Tubbs trial begins in Superior Court (8 week trial estimate)
- January 15, 2020:** File initial Disclosure Statement (one combined Disclosure Statement for both plans)
- February 18, 2020:** Estimation proceedings begin in Federal District Court
- March 4, 2020:** Completion of Federal Court estimation hearing, including incorporation of Tubbs trial result.
- March 10, 2020:** File amended plans and amended Disclosure Statement to incorporate results of estimation hearing and any resulting change to exit financing.
- March 20, 2020:** Hearing to approve final Disclosure Statement
- May 1, 2020:** Plan voting deadline, and deadline for confirmation objections.
- May 7, 2020:** Confirmation hearing.